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April 8, 2024

**VIA ECF AND ELECTRONIC MAIL**

Hon. Harvey Bartle III, U.S.D.J.  
United States District Court for the Eastern District of Pennsylvania  
16614 U.S. Courthouse  
601 Market Street  
Philadelphia, Pennsylvania 19106

**Re: Daniel's Law Cases Identified in Counsel's April 4, 2024 Filing Schedule A**

Dear Judge Bartle:

We, along with co-counsel, represent Plaintiffs in the Daniel's Law litigation that was recently transferred to Your Honor pursuant to an April 2, 2024 Order of Designation of District Judge to Hold a District Court within the Circuit issued by Court of Appeals Chief Judge Chagares. We write in response to certain defendants' request for a case management conference and stay.<sup>1</sup>

Plaintiffs have been engaged in discussions with many counsel for defendants about the Daniel's Law litigation. Some have been productive. Unfortunately, contrary to the custom in our District, these defendants gave Plaintiffs mere hours to reply to their April 4, 2024 email proposal. Within an hour, Plaintiffs responded to this proposal with the goal of seeking common ground, but received no response from those defendants.

Plaintiffs welcome an opportunity to discuss an efficient way for the Court to manage this crucial litigation, but cannot agree to an indefinite stay of these cases. As you may know, Daniel's Law was passed to protect the privacy and safety of current and retired judges, law enforcement officers, prosecutors, and their families ("Covered Persons"). The anecdotes in Plaintiffs' complaints are a small example of the immediate and reparable harms that Plaintiffs seek to enjoin.

Many of the defendants before this Court remain out of compliance, despite having more than three (3) months to comply with what Daniel's Law requires in ten (10) business days. This continues to endanger the public servants and their families who put their lives at risk every day

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<sup>1</sup> Plaintiffs have e-filed this letter in the two matters in which the April 4, 2024 letter from *some* defense counsel was filed.

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to protect the great people and businesses in this state. Nefarious actors and criminals remain free to identify and browse these defendants' websites and gather Covered Persons' information. This is a real, concrete, present risk.

Thus, while Plaintiffs have and will continue to extend professional courtesies to counsel, and welcome a case management discussion, Plaintiffs respectfully cannot agree to indefinite stays and expressly reserve their rights to oppose these delay tactics from defendants that believe trading in personal information is more important than protecting public servants.

We look forward to discussing these matters further with the Court today and thereafter.

Respectfully,

**PEM LAW LLP**

Rajiv D. Parikh  
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c: Co-Counsel for Plaintiffs  
Mark Mao, Esq. (via electronic mail)  
John Yanchunis, Esq. (via electronic mail)  
Adam Shaw, Esq. (via electronic mail)  
Ryan McGee, Esq. (via electronic mail)  
*(applications for pro hac vice admission forthcoming)*

Counsel for Defendants (via ECF and/or electronic mail)